



FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 12, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Curcio
c/o Greg Stevens & Company
201 N. Union Street, Suite 400
Alexandria, VA 22314

RE: MUR 3774

Dear Mr. Curcio:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached Subpoena to Produce Documents and Order to Submit Written Answers which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this Subpoena and Order. However, you are required to submit the information within 30 days of your receipt of this Subpoena and Order. All answers to questions must be submitted under oath.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Dawn M. Odrowski by mab

Dawn M. Odrowski
Attorney

Enclosure
Subpoena and Order

2025-04-23 14:56:40

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) MUR 3774
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Paul Curcio
c/o Greg Stevens & Company
201 N. Union Street, Suite 400
Alexandria, VA 22314

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.


Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his
hand in Washington, D.C. on this 11th day of February 1997.

For the Commission,


John Warren McGarry
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachments
Interrogatories and Request for Documents

INSTRUCTIONS

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the person to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communication(s)" or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic messages.

INTERROGATORIES

1. Identify by name and position all contact persons at the following Senate campaigns with whom you communicated in 1992:

a. Paul Coverdell's Senate campaign, including the November 3 general election campaign and the November 24 runoff.

b. Bob Kasten's Senate campaign..

c. Mike DeWine's Senate campaign.

d. Bob Packwood's Senate campaign.

e. Lauch Faircloth's Senate campaign.

f. Thomas Hartnett's Senate campaign.

g. Dirk Kempthorne's Senate campaign.

2. Identify by name and position all contact persons at the following Senate campaigns with whom you communicated in 1993:

a. Kay Bailey Hutchison's Senate campaign

3. Identify by name and position all contact persons at the following Senate campaigns with whom you communicated in 1994.

a. Rod Grams' Senate campaign.

b. Rick Santorum's Senate campaign.

PRODUCTION OF DOCUMENTS

1. Produce all appointment books, desk calendars, diaries or other such documents used by you from January 1, 1992 through December 31, 1994 in connection with your employment with the National Republican Senatorial Committee.

2. Produce all documents that in any way contain or refer to any communication in 1992 between you and each of the persons and organizations listed below concerning federal elections. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Eugene McDaniel, Mike McDaniel, John Isaf and any other officer, employee or consultant of the American Defense Institute and the American Defense Foundation.

b. John Grotta

c. Lee MacGregor

d. David O'Steen, Carol Long, Darla St. Martin and any other officer, employee or consultant of the National Right to Life Committee and/or the National Right to Life Committee Political Action Committee.

e. Eric Licht or any other officer or employee of Coalitions for America.

3. Produce all documents that in any way contain or refer to any communication in 1992 between you and each of the persons and organizations listed below concerning get-out-the-vote activities, voter guides or candidate questionnaires. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Paul Coverdell or any officer, employee or consultant of his Senate campaign, including the campaigns for November 3, 1992 general election and the November 24 runoff election.

b. Bob Kasten or any officer, employee or consultant of his Senate campaign.

c. Mike DeWine or any officer, employee or consultant of his Senate campaign.

d. Bob Packwood or any officer, employee or consultant of his Senate campaign.

e. Lauch Faircloth or any officer, employee or consultant of his Senate campaign.

f. Thomas Hartnett or any officer, employee or consultant of his Senate campaign.

g. Dirk Kempthorne or any officer, employee or consultant of his Senate campaign.

4. Produce all documents that in any way contain or refer to any communication in 1993 between you and each of the persons and organizations listed below concerning federal elections. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Eugene McDaniel, Mike McDaniel, John Isaf and any other officer, employee or consultant of the American Defense Institute and the American Defense Foundation

b. Curt Anderson

c. Wes Anderson

5. Produce all documents that in any way contain or refer to any communication in 1993 between you and each of the persons and organizations listed below concerning get-out-the-vote activities, voter guides or candidate questionnaires. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Kay Bailey Hutchison or any officer, employee or consultant of her Senate campaign, including the campaigns for the May 1, 1993 special election and the June 5, 1993 special election run-off.

6. Produce all documents that in any way contain or refer to any communication in 1994 between you and each of the persons and organizations listed below concerning federal elections. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Curt Anderson

b. David O'Steen, Carol Long, Darla St. Martin and any other officer, employee or consultant of the National Right to Life Committee and/or the National Right to Life Political Action Committee.

c. Jacqueline Schwietz, Marice Rosenberg or any other officer, employee or consultant of the Minnesota Citizen's Concerned for Life, Inc. or its separate segregated fund, Minnesota Citizen's Concerned for Life Committee for a Pro Life Committee.

7. Produce all documents that in any way contain or refer to any communication in 1994 between you and each of the persons and organizations listed below concerning get-out-the-vote activities, voter guides or candidate questionnaires. Documents produced should include, but not be limited to, any notes, correspondence, faxes, telephone messages or logs, electronic mail messages, or memoranda.

a. Rod Grams and any officer, employee or consultant of his Senate campaign.

b. Rick Santorum and any officer, employee or consultant of his Senate campaign.